

**United States Bankruptcy Court
Southern District of New York**

29-April-2011

In reference to:

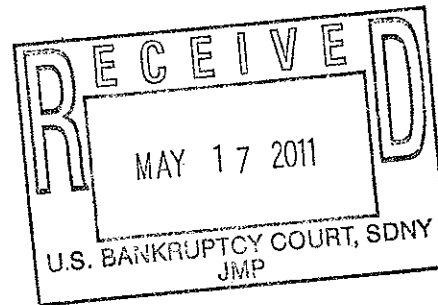
Lehman Brothers Holdings Inc., et al., Debtors.
Chapter 11 Case No. 08-13555 (JMP)
Jointly Administered**

Title of Debtor Objection Filed:

Omnibus Objection to Claims (No Liability Non-Debtor Employee Claims)

Creditor/Claimant Name and Address:

Santoro, Vito
130 Aregood Lane
Islamorada, FL 33036
Claim Number: 32308



Dear Sir/Madam,

I respectfully submit that my claim (#32308) *should not* be disallowed and expunged by the United States Bankruptcy Court, Southern District of New York, for reasons set forth collectively by 'the debtors'** in their one hundred seventeenth omnibus objection to claims (no liability non-debtor employee claims), as dated March 25, 2011.

I am owed contractually defined compensation and/or commissions for the year 2008 representing an unsecured debt, as highlighted by an employment contract, copy of which was included with supporting documentation attached to proof of claim (#32308), on record with the court and filed/received on September 22, 2009 [Epiq Bankruptcy Solutions, LLC].

My claim against 'the debtors' to compensation from the bankruptcy court is based on the non-discretionary, formulaic guidelines set forth in said employment contract, duly executed with Lehman Brothers and dated January 15, 2008. The contract specifically designates how compensation numbers at issue are calculated, the largest portion of which are based on final trading revenues for the year as officially described by Lehman Brothers' Consolidated Analysis of P & (L) Report, copy of which was included with supporting documentation attached to proof of claim (#32308). For the year 2008, trading year end was September 15, 2008, the day Lehman Brothers filed for bankruptcy.

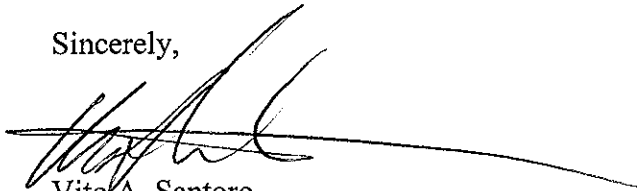
It is this dated, final copy of the Consolidated Analysis of P & (L) Report, mentioned above, that was included with proof of claim (#32308).

As can be seen from this report, my final trading revenue as of September 15, 2008, was \$5.2mm. A portion of this gross trading revenue, as listed in my claim, is contractually owed to me. As written and executed, the contract created an accruing liability or unsecured debt, on the part of Lehman Brothers, payable to me, based formulaically on the previously described gross trading revenues. This debt was to be reserved on a monthly basis and then paid out to me at the end of the trading year. Once bankruptcy was declared on September 15, 2008, the trading year de facto ended and said debt became immediately due, but was not honored, thus my claim.

Given the facts above— an executed and valid non-discretionary employment contract, acceptance on the part of Lehman Brothers and positive trading revenues generated, I find it unconscionable that 'the debtors' should now seek through the court to disallow and expunge my valid claim on the very assets I helped to generate. I note further, that without the efforts of the many revenue-side employees like me who generated trading profits for the firm under contractual expectations duly agreed by Lehman Brothers, the remaining pool of assets the bankruptcy court now oversees would be much reduced.

I hope that the court sees the same validity and reasoning behind my claim as clearly as I do.

Sincerely,



Vito A. Santoro

Copies to:

Honorable James M. Peck
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New York, NY 10004

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Attn: Dennis F. Dunne, Esq.
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Lead Debtor: **

Lehman Brothers Holdings Inc.

Related Debtors:

LB 745 LLC

PAMI Statler Arms LLC

Lehman Brothers Commodity Services Inc.

Lehman Brothers Special Financing Inc.

Lehman Brothers OTC Derivatives Inc.

Lehman Brothers Derivative Products Inc.

Lehman Commercial Paper Inc.

Lehman Brothers Commercial Corporation

Lehman Brothers Financial Products Inc.

Lehman Scottish Finance L.P.

CES Aviation LLC

CES Aviation V LLC

CES Aviation IX LLC

East Dover Limited

Luxembourg Residential Properties Loan Finance S.a.r.l.

BNC Mortgage LLC

Structured Asset Securities Corporation

LB Rose Ranch LLC

LB 2080 Kalakaua Owners LLC

Merit LLC

LB Somerset LLC

LB Preferred Somerset LLC

The chapter 11 case of Fundo de Investimento Multimercado Credito Privado Navigator Investimento No Exterior (Case No: 08-13903) was dismissed.

The chapter 11 case of Lehman Brothers Finance SA (Case No: 08-13887) was dismissed.